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October 9, 2018

Michelle Mullin, Project Manager
Dave Bartus, Interim Project Manager
U.S. Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Re: Rainier Commons Phase I Close Out Report – Supplement to Response to Request for Additional Information

Dear Ms. Mullin and Mr. Bartus,

We recently provided the responses and additional information that EPA requested in connection with your review of the Rainier Commons IPWP Phase I Close Out Report. With respect to substrate testing, two of the samples collected came back with results at 1.1 ppm and 1.6 ppm PCBs, just slightly exceeding the level allowed for wholly unrestricted High Occupancy use. While these areas are Low Occupancy areas, under the PCB regulations, it was unclear whether the full EPA protocol for gathering these samples for porous substrate material had been performed, when those samples were first collected. Therefore, Rainier Commons collected additional substrate samples from those two areas, co-located just adjacent to the original samples.

The results of the additional substrate samples are non-detect for PCBs. One sample is concrete and one sample is sandstone. The field notes and photographs documenting this additional sampling are attached hereto as a supplement to the Phase I Close Out Report.

Please let us know if you have any additional questions on the Close Out Report.

Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC

Jo M. Flannery
Attorney Of Counsel

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JMF:rw
Enclosure
cc: Alex Fidis, EPA Regional Counsel

Rainier Commons Exterior Paint Removal Project

Daily Observations & Activity Report

(Note Date, Report # and Page # on each sheet)

Date:

9-27-18

Daily Report #:

Notes on Daily Observations and Activities

0700

TWO OF EIGHT PREVIOUSLY SAMPLED - POST CLEARANCE - SUBSTRATE SAMPLES CONTAINED PCB LEVELS SLIGHTLY HIGHER THAN 1PPM. DOCUMENTATION AND PHOTOS ARE SOMEWHAT UNCLEAR WHETHER THE "EPA SOP FOR SAMPLING POROUS SURFACES FOR POLYCHLORINATED BI-PHENOLS" WERE FOLLOWED AS TO EACH COMPONENT OF THE SAMPLING PROCEDURE, PARTICULARLY AS IT PERTAINS TO SURFACE PREPARATION - SECTION 9.1.1. THEREFORE, WE WILL RETEST THE TWO SAMPLED AREAS IN QUESTION.

0730

YOUVAL AND I LOCATED THE PREVIOUS SAMPLE COLLECTION AREA FOR BUILDING 13, WEST ELEVATION.

0735

A CLEAN, NYLON BRISTLE BRUSH WAS USED TO REMOVE ANY DEBRIS FROM THE SAMPLE AREA. THE BRUSH WAS THEN RINSED WITH

INSPECTOR

Signature



Date

9-27-18

Daily Observation / Activity Report (Version 1) (6-11-14)

Page 1 of 3

- Include reasons for non-satisfactory responses noted in Daily Inspection Checklist
- If referring to any item from Daily Inspection Checklist, give row #
- Submit Daily Inspection Checklist and Daily Observations/Activity Report along with sample submission and data sheets to NVL Labs

Rainier Commons Exterior Paint Removal Project

Daily Observations & Activity Report

(Note Date, Report # and Page # on each sheet)

Date: 9-27-18

Daily Report #: _____

Notes on Daily Observations and Activities	
0735 CONT.	XYLENE FOR SUBSEQUENT USE.
0740	NEW MASKING PAPER AND TAPE WAS APPLIED TO THE WALL SURFACE TO "CATCH" THE SUBSTRATE DUST GENERATED BY DRILLING
0745	A 5/8" DIA. ROTO-HAMMER BIT WAS CLEANED WITH XYLENE AND AN UN-USED CLOTH RAG, PRIOR TO USE.
0750	TWO HOLES $\approx 1/2$ " DEEP WERE DRILLED ADJACENT TO THE OLD TEST HOLES AND THE DUST COLLECTED INTO A PLASTIC SAMPLE BAG. SAMPLE # 92718DL-PCB13
0755	THE ROTO-HAMMER BIT WAS CLEANED WITH XYLENE USING A NEW RAGS. CLEANING RAGS AND MASKING WERE COLLECTED FOR PROPER DISPOSAL
0800	LOCATED THE PREVIOUS SAMPLE COLLECTION AREA FOR SANDSTONE ON BUILDING 11, WEST ELEVATION.

INSPECTOR

Signature

9-27-18

Date

Daily Observation / Activity Report (Version 1) (6-11-14)

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Rainier Commons Exterior Paint Removal Project

Daily Observations & Activity Report

(Note Date, Report # and Page # on each sheet)

Date: 9-27-18

Daily Report #: _____

Notes on Daily Observations and Activities	
0805	THE PREVIOUSLY CLEANED NYLON BRUSH
	WAS USED TO REMOVE ANY DEBRIS.
0810	NEW MASKING PAPER AND TAPE WAS
	APPLIED TO THE SANDSTONE TO FORM A DAM
	TO CATCH THE SUBSTRATE DUST
0815	TWO HOLES $\approx 1/2$ " DEEP WERE DRILLED NEAR
	THE ORIGINAL TEST HOLES. THE DUST WAS
	COLLECTED INTO A PLASTIC SAMPLE BAG.
	SAMPLE # 92718DL-PCB11
0825	CLEANED THE ROTO-BIT WITH XYLENE.
	COLLECTED MASKING AND RAGS AND PLACED
	THEM IN ON-SITE HAZ-MAT STORAGE BOX
1400	TOOK SAMPLES TO NVL LAB FOR TESTING

INSPECTOR

Signature

Date

9-27-18

Daily Observation / Activity Report (Version 1) (6-11-14)

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Location of previous concrete samples taken for the west elevation of Building 13

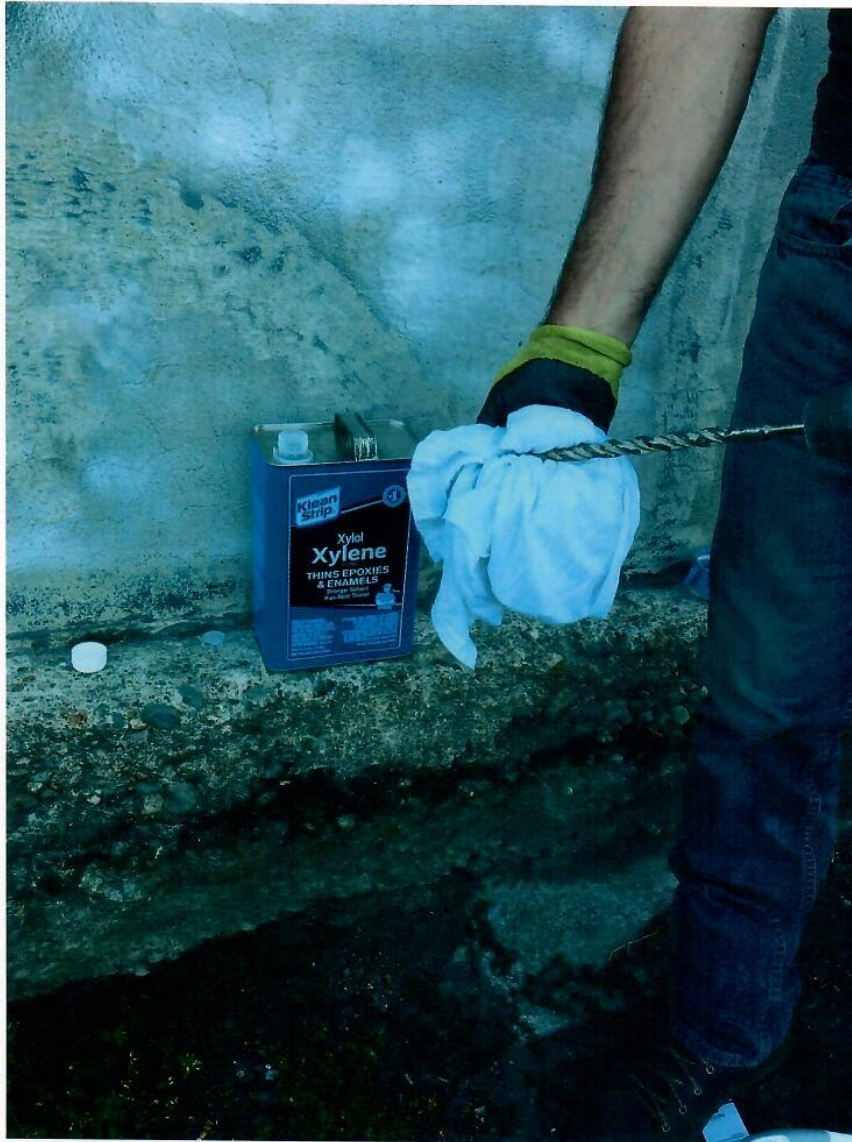
*On this and subsequent photographs, the blue cast/tinting is an artifact of the photographic process and is not indicative of actual colors.



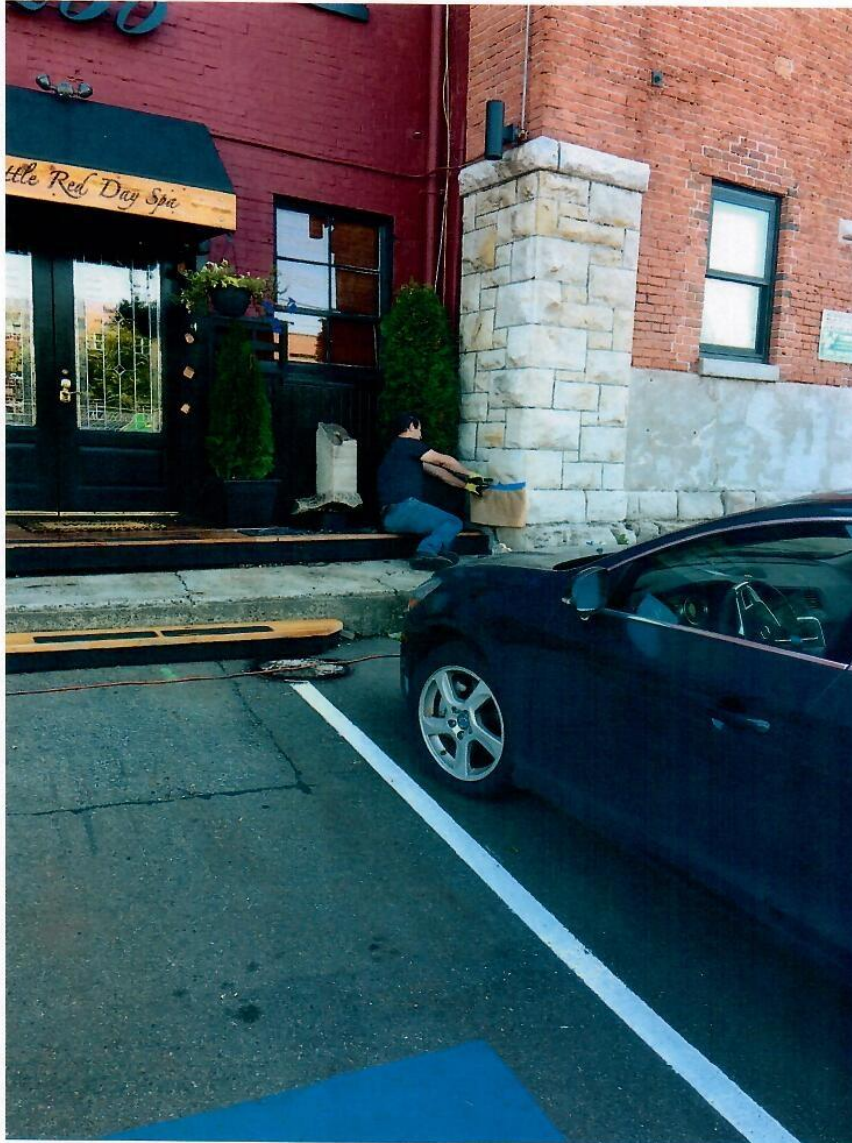
Cleaning of concrete substrate utilizing USEPA SOP for Sampling Porous Surfaces for Polychlorinated Biphenyls, Section 9.1.1



Collection of concrete substrate utilizing USEPA SOP for Sampling Porous Surfaces for Polychlorinated Biphenyls, Section 9.1.4. The retest samples were co-located with previous samples.



Cleaning roto-hammer bit after each sample to eliminate risk of cross-contamination between samples



Location of sampling area on Building 11's west elevation.



Previous sampling locations are identified by gloved hand. New sample to be taken just above the blue tape. Spacing between samples is for esthetic purposes.



Cleaning of sandstone substrate utilizing USEPA SOP for Sampling Porous Surfaces for Polychlorinated Biphenyls, Section 9.1.1



Collection of sandstone substrate utilizing USEPA SOP for Sampling Porous Surfaces for Polychlorinated Biphenyls, Section 9.1.4